UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-31828

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES & TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICAN, LOCAL 31, AFL-CIO,

And

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-33125 (formerly 2-CA-36129)

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES & TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICAN, LOCAL 11, AFL-CIO.

MOTION OF CNN AMERICA, INC. TO FILE A CONSOLIDATED REPLY BRIEF

CNN America, Inc. ("CNN") hereby respectfully requests leave to file one consolidated reply brief of no more than 100 letter-sized, double-spaced pages on or before Tuesday, June 30, 2009. The General Counsel and Locals 11 and 31 have informed CNN that they do not object to this motion. In support of its request, CNN states as follows:

- 1. The General Counsel, Local 31, and Local 11 each submitted briefs answering CNN's exceptions, totaling 470 pages (218, 217, and 35 pages, respectively, each).
- 2. On May 21, 2009, the Associate Executive Secretary granted the joint motion of the General Counsel and CNN for an extension of time for the parties to file their reply briefs on or before Tuesday, June 30, 2009. In addition, the Associate Executive Secretary granted the parties "permission to exceed the page limitation with respect to their reply briefs" as long as they do not exceed 50 pages. Thus, under the May 21, 2009 Order, CNN is permitted to file

three briefs of 50 pages each in response to the three briefs filed by the General Counsel and the Unions.

- 3. CNN respectfully submits that it will be able to address the issues more efficiently in one consolidated reply brief of no more than 100 letter-sized, double-spaced pages, instead of the three separate 50-page briefs allowed in the May 21, 2009 Order. One CNN reply brief will avoid repetition, limit confusion, and reduce both the overall length and number of the reply briefs.
- 4. Therefore, CNN respectfully requests leave to file one consolidated reply brief of no more than 100 letter-sized, double-spaced pages. Pursuant to the Associate Executive Secretary's May 21, 2009 Order, CNN would file the consolidated reply brief on or before Tuesday, June 30, 2009.

Respectfully Submitted,

PAUL, HASTINGS, JANOFSKY & WALKER LLP

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COUNSEL FOR RESPONDENT CNN AMERICA, INC.

UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC, JOINT EMPLOYERS

and

Case 5-CA-31828

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AFFIDAVIT OF SERVICE

Eric Engberg, being duly sworn, deposes and says as follows:

- 1. I am over 18 years of age, am not a party to this proceeding, and am employed by the law firm of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, N.W., Washington, D.C. 20005.
- 2. On the 3rd day of June, 2009, I filed, by E-file, the Motion of CNN America, Inc. to File a Consolidated Reply Brief, with Henry S. Breiteneicher, Associate Executive Secretary, National Labor Relations Board, 1099 14th Street, N.W., Washington, D.C. 20570.

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3. On the 3rd day of June, 2009, I served one true and correct copy of the Motion of CNN America, Inc. to File a Consolidated Reply Brief, by e-mail, on the following:

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4. On the 3rd day of June, 2009, I served one true and correct copy of the Motion of CNN America, Inc. to File a Consolidated Reply Brief, by overnight delivery on the following and notified the same by telephone at the numbers below:

Steve Sturm, Esq. Sturm and Pearl 9 Wittman Drive Katonah, NY 10536 (914) 299-4007 National Association of Broadcast Employees and Technicians Local 11 145 West 30th Street, 12th Floor New York, NY 10001 (212) 757-3065 Communications Workers of America, District 2 c/o Jimmy Tarleu, Esq. 17000 Science Drive, Ste. 210 Bowie, MD 20715 (301) 809-4160

Mr. Larry D'Anna Team Video Services, LLC 4455 Connecticut Avenue, N.W., Suite 300 Washington, DC 20008 (202) 363-1000 NABET-CWA Local 52031 962 Wayne, Suite 400 Silver Spring, MD 20910 (301) 495-4999

Matt Harris, Esq. Communications Workers of America, AFL-CIO 501 3rd Street, N.W., Suite 800 Washington, DC 20001 (202) 434-1100

Eric Engberg

Sworn to before me this 3rd day of June, 2009

Notary Public

Catherine A. Bynum Notary Public, District of Columbia My Commission Expires 02/14/2010

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